

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

v.

OPEYEMI OLUJOBI,
a/k/a "Tyler Olujobi," and
JENNIE DAVIDSON,

Defendants.

██████████ COMPLAINT

26mj1408

Violations of 18 U.S.C. §§ 1349,
1029(a)(2), (a)(5), and (b)(2), 1028A, and
1956

COUNTIES OF OFFENSE:
DUTCHESS and ORANGE

SOUTHERN DISTRICT OF NEW YORK, ss.:

GREG T. GHIOZZI, being duly sworn, deposes and says that he is a Postal Inspector with the United States Postal Inspection Service ("USPIS"), and charges as follows:

COUNT ONE

(Conspiracy to Commit Mail Fraud, Wire Fraud, and Bank Fraud)

1. From at least in or about May 2023 through at least in or about October 2024, in the Southern District of New York and elsewhere, OPEYEMI OLUJOBI a/k/a "Tyler Olujobi," and JENNIE DAVIDSON, the defendants, and others known and unknown, willfully and knowingly combined, conspired, confederated, and agreed together and with each other to commit mail fraud, in violation of Title 18, United States Code, Section 1341, wire fraud, in violation of Title 18, United States Code, Section 1343, and bank fraud, in violation of Title 18, United States Code, Section 1344.

2. It was a part and an object of the conspiracy that OPEYEMI OLUJOBI a/k/a "Tyler Olujobi," and JENNIE DAVIDSON, the defendants, and others known and unknown, knowingly having devised and intending to devise a scheme and artifice to defraud, and for obtaining money or property by means of false and fraudulent pretenses, representations, and promises, for the purpose of executing such scheme and artifice and attempting so to do, would and did place in a post office and authorized depository for mail matter, a matter and thing whatever to be sent and delivered by the Postal Service, and deposit and cause to be deposited a matter and thing whatever to be sent and delivered by a private and commercial interstate carrier, and take and receive therefrom, such matter and thing, and knowingly cause to be delivered by mail and such carrier according to the direction thereon, and at the place at which it is directed to be delivered by the person to whom it is addressed, such matter and thing, in violation of Title 18, United States Code, Section 1341, to wit, OLUJOBI and DAVIDSON agreed to fraudulently obtain credit cards issued to other individuals and transmitted by the United States mail to Hopewell Junction, New York.

3. It was a part and an object of the conspiracy that OPEYEMI OLUJOBI a/k/a “Tyler Olujobi,” and JENNIE DAVIDSON, the defendants, and others known and unknown, knowingly having devised and intending to devise a scheme and artifice to defraud, and for obtaining money and property by means of false and fraudulent pretenses, representations, and promises, would and did transmit and cause to be transmitted by means of wire, radio, and television communication in interstate and foreign commerce, writings, signs, signals, pictures, and sounds for the purpose of executing such scheme and artifice, which affected a financial institution, in violation of Title 18, United States Code, Section 1343, to wit, OLUJOBI and DAVIDSON agreed to make and caused to be made false statements to Victim Bank-1 in order to obtain credit cards issued to other individuals, and sent and received, and caused others to make, send and receive, phone calls, emails and other electronic communications, to and from the Southern District of New York and elsewhere, in furtherance of that scheme.

4. It was a part and an object of the conspiracy that OPEYEMI OLUJOBI a/k/a “Tyler Olujobi,” and JENNIE DAVIDSON, the defendants, and others known and unknown, knowingly would and did execute, and attempt to execute, a scheme and artifice to defraud a financial institution, as that term is defined in Title 18, United States Code, Section 20, and to obtain moneys, funds, credits, assets, securities, and other property owned by, and under the custody and control of, such a financial institution, by means of false and fraudulent pretenses, representations, and promises, in violation of Title 18, United States Code, Section 1344, to wit, OLUJOBI and DAVIDSON agreed to make and cause to be made false statements to Victim Bank-1 in order to obtain credit cards issued to other individuals.

(Title 18, United States Code, Section 1349)

COUNT TWO
(Conspiracy to Commit Access Device Fraud)

5. From at least in or about May 2023 through at least in or about October 2024, in the Southern District of New York and elsewhere, OPEYEMI OLUJOBI a/k/a “Tyler Olujobi,” and JENNIE DAVIDSON, the defendants, and others known and unknown, willfully and knowingly did combine, conspire, confederate, and agree together and with each other to commit access device fraud, in violation of Title 18, United States Code, Sections 1029(a)(2) and (a)(5).

6. It was a part and an object of the conspiracy that OPEYEMI OLUJOBI a/k/a “Tyler Olujobi,” and JENNIE DAVIDSON, the defendants, and others known and unknown, knowingly and with intent to defraud, as part of an offense affecting interstate and foreign commerce, would and did traffic in and use one and more unauthorized access devices during a one-year period, and by such conduct obtain items of value aggregating \$1,000 and more during that period, in violation of Title 18, United States Code, Section 1029(a)(2).

7. It was further a part and an object of the conspiracy that OPEYEMI OLUJOBI a/k/a “Tyler Olujobi,” and JENNIE DAVIDSON, the defendants, and others known and unknown, knowingly and with intent to defraud, as part of an offense affecting interstate and foreign commerce, would and did effect transactions, with one and more access devices issued to another person or persons, to receive payment and any other thing of value during a one-year period the

aggregate value of which was equal to and greater than \$1,000, in violation of Title 18, United States Code, Section 1029(a)(5).

Overt Acts

8. In furtherance of the conspiracy and to effect the illegal objects thereof, the following overt acts, among others, were committed in the Southern District of New York and elsewhere¹:

a. From in or about May 2023 through in or about October 2024, OPEYEMI OLUJOBI a/k/a “Tyler Olujobi” and JENNIE DAVIDSON, the defendants, and/or one of their co-conspirators called Victim Bank-1 purporting to be various individual customers of Victim Bank-1, replaced the addresses connected with those customers’ Victim Bank-1 credit card accounts with one of several addresses in Hopewell Junction, New York, including the Defendants’ Residence, and caused credit cards issued in the names of those accountholders to be mailed to these addresses and subsequently obtained by OLUJOBI and DAVIDSON.

b. OLUJOBI, DAVIDSON, and/or one of their co-conspirators obtained credit cards issued in other individuals’ names, including Victim-1, Victim-2, Victim-3, and Victim-4.

c. OLUJOBI, DAVIDSON, and/or one of their co-conspirators obtained verification codes, so they could make changes to accounts connected with cards issued in other individuals’ names so they could use them.

d. OLUJOBI, DAVIDSON, and/or one of their co-conspirators opened, inspected, and retained mail addressed to others, including Victim-1, Victim-2, Victim-3, and Victim-4, that was sent to the Defendants’ Residence and several other addresses in Hopewell Junction, New York.

e. On or about May 13 and 14, 2024, OLUJOBI purchased a total of approximately \$7,300 in gift cards and merchandise without authorization using a credit card number ending in 4802 associated with Victim-1 at a store located in Norwalk, Connecticut.

f. On or about August 1, 2024, DAVIDSON purchased approximately \$7,900 in gift cards and merchandise without authorization using a credit card number ending in 9133 associated with Victim-2 at two stores located in Newburgh, New York, and Kingston, New York.

g. Between on or about August 9, 2024, and on or about August 11, 2024, OLUJOBI and DAVIDSON purchased a total of approximately \$19,300 in gift cards and merchandise without authorization using a credit card number ending in 2081 associated with Victim-3 at three stores located in Monroe, New York; Middletown, New York; and Mohegan Lake, New York.

¹ Capitalized terms have the same meaning as defined later in this affidavit.

h. Between on or about September 23, 2024, through on or about September 27, 2024, OLUJOBI and DAVIDSON purchased a total of approximately \$16,100 in gift cards and merchandise without authorization using a credit card number ending in 1606 associated with Victim-4 at nine stores located in Riverdale, New Jersey; Fishkill, New York; Wappingers Falls, New York; Wayne, New Jersey; and Poughkeepsie, New York.

i. While using certain credit cards issued in other people's names, OLUJOBI, DAVIDSON, and/or one of their co-conspirators caused Victim Bank-1 to raise the credit limits associated with those cards so they could continue making purchases.

j. When Victim Bank-1 declined certain transactions that OLUJOBI and DAVIDSON made using credit cards issued in other people's names, they and/or one of their co-conspirators accessed the cardholder's account and approved those transactions.

(Title 18, United States Code, Section 1029(a)(2), (a)(5), and (b)(2).)

COUNT THREE
(Access Device Fraud)

9. From at least in or about May 2023 through at least in or about October 2024, in the Southern District of New York and elsewhere, OPEYEMI OLUJOBI a/k/a "Tyler Olujobi" and JENNIE DAVIDSON, the defendants, knowingly and with intent to defraud, as part of an offense affecting interstate and foreign commerce, would and did (i) traffic in and use one and more unauthorized access devices during a one-year period, and by such conduct obtained items of value aggregating \$1,000 and more during that period, in violation of Title 18, United States Code, Section 1029(a)(2) and (ii) effect transactions, with one and more access devices issued to another person or persons, to receive payment and any other thing of value during a one-year period the aggregate value of which was equal to and greater than \$1,000, in violation of Title 18, United States Code, Section 1029(a)(5); to wit, OLUJOBI and DAVIDSON fraudulently obtained credit cards in other peoples' names that they were not authorized to use and then used those cards to effect transactions and receive at least thousands of dollars of money and merchandise.

(Title 18, United States Code, Sections 1029(a)(2), (a)(5), and 2.)

COUNT FOUR
(Aggravated Identity Theft)

10. From at least in or about May 2023 through at least in or about October 2024, in the Southern District of New York and elsewhere, OPEYEMI OLUJOBI a/k/a "Tyler Olujobi," and JENNIE DAVIDSON, the defendants, knowingly transferred, possessed, and used, without lawful authority, a means of identification of another person, during and in relation to a felony violation enumerated in Title 18, United States Code, Section 1028A(c), to wit, OLUJOBI and DAVIDSON used and transferred the names and credit card numbers of other persons during and in relation to the conspiracy to commit mail fraud, wire fraud, and bank fraud charged in Count

One of this Complaint, the conspiracy to commit access device fraud charged in Count Two of this Complaint, and the access device fraud charged in Count Three of this Complaint.

(Title 18, United States Code, Sections 1028A(a)(1) and (b), and 2.)

COUNT FIVE
(Money Laundering)

11. From at least on or about May 5, 2024, through at least on or about August 18, 2024, in the Southern District of New York and elsewhere, JENNIE DAVIDSON, the defendant, knowing that the property involved in a financial transaction represented the proceeds of some form of unlawful activity, conducted and attempted to conduct such a financial transaction, which transaction affected interstate and foreign commerce and involved the use of a financial institution which was engaged in, and the activities of which affected, interstate and foreign commerce, and which in fact involved the proceeds of specified unlawful activity, to wit, conspiracy to commit access device fraud and access device fraud, in violation of Title 18, United States Code, Sections 1029(a)(2), (a)(5), and (b)(2), knowing that the transaction was designed in whole and in part to conceal and disguise the nature, the location, the source, the ownership, and the control of the proceeds of specified unlawful activity.

(Title 18, United States Code, Section 1956(a)(1)(B)(i).)

The bases for my knowledge and for the foregoing charges are, in part, as follows:

12. I have been a Postal Inspector with USPS for approximately 22 years. I have been personally involved in the investigation of this matter, as well as hundreds of investigations of fraud, particularly fraud having some connection with the United States mail. This affidavit is based on my personal participation in the investigation of this matter, my conversations with other law enforcement agents, witnesses, agents of financial institutions, individual victims, and others, my examination of documents and reports, as well as my training and experience. Because this affidavit is being submitted for the limited purpose of establishing probable cause, it does not include all the facts that I have learned during my investigation. Where the contents of documents and the actions, statements, and conversations of others are reported herein, they are reported in substance and in part unless otherwise indicated.

13. Based on my involvement in this investigation, and as detailed below, I have learned that, from at least in or about May 2023 through at least in or about October 2024, OPEYEMI OLUJOBI a/k/a “Tyler Olujobi” and JENNIE DAVIDSON, the defendants, participated in an account takeover² fraud scheme involving more than approximately 600 store

² An “account takeover” scheme is a scheme in which a fraudster uses a victim’s personal information to gain control over a victim’s financial account, allowing the fraudster to make changes to the account and use it for their own personal gain.

credit card accounts³ whose card shipping addresses were changed to one of approximately four addresses in Hopewell Junction, New York. All of these store credit cards were issued by a financial institution insured by the Federal Deposit Insurance Company (“Victim Bank-1”). Across those over 600 accounts, the participants in the scheme caused at least around 276 credit cards to be fraudulently shipped to those addresses, following which the scheme participants conducted at least approximately \$575,423 in fraudulent, unauthorized transactions for their own personal gain. Additionally, I have learned that DAVIDSON, to conceal the nature and source of her criminal proceeds, deposited some of her fraudulently obtained funds into an account that she held with an online sports betting platform (“Betting Platform-1”), which she then transferred to her personal bank accounts.

The Credit Card Fraud Conspiracy

14. Based on my conversations with employees of Victim Bank-1 and my review of records from Victim Bank-1, including customer service records and phone call recordings, I have learned the following, in substance and in part:

a. Victim Bank-1 issues consumer credit cards for use at various retail stores and is a subsidiary of a publicly traded consumer financial services company that provides services throughout the United States. In or about July 2024, Victim Bank-1 began investigating an account takeover scheme that generally operated as follows:

i. For each account, a participant in the scheme called or electronically messaged Victim Bank-1’s customer service purporting to be various accountholders. In each case, the participant used phone numbers that were not listed as belonging to any of the respective accountholders. Based on records obtained from mobile service providers, the phone numbers used by these individuals were provided by companies that generate app-based phone numbers, which often cannot be traced to any end user. When this contact happened by phone, based on my review of the call recordings, the caller sounded like the same male individual, including when the purported accountholder had a plainly female name.

ii. During these communications, the caller initially changed the address for each account to a residence on Jackson Road in Hopewell Junction, New York (the “Defendants’ Residence”).⁴

³ Based on my training and experience, commercial retail stores commonly offer their customers the ability to sign up for store credit cards bearing the store’s name, which often provides points, discounts, or reduced interest rates if the customer uses that store credit card to make purchases at the store. Because these commercial retailers are typically not in the business of issuing credit, they typically find a financial institution partner who will issue and then service the store credit card for the retailer to provide to its customers.

⁴ Based on my review of publicly available information, including Google Search results and Google Maps images, the Defendants’ Residence is a single-family home.

1. Based on my review of bank statements in the names of OPEYEMI OLUJOBI a/k/a “Tyler Olujobi” and JENNIE DAVIDSON, the defendants, and records from the United States Postal Service (“USPS”) and New York State Department of Motor Vehicles (“DMV”), I understand that, from at least in or about May 2023 through at least in or about October 2024, OLUJOBI and DAVIDSON resided at the Defendants’ Residence. In particular, in or about November 2022, OLUJOBI submitted a change of address form to USPS, updating his mailing address from a residence in Manhattan, New York to the Defendants’ Residence. DMV records and statements for bank accounts in OLUJOBI’s name list the Defendants’ Residence as associated with OLUJOBI. DAVIDSON also registered the Defendants’ Residence as her address with USPS in 2022. Moreover, DMV records, statements for bank accounts in DAVIDSON’s name, and account information for DAVIDSON at Betting Platform-1 list the Defendants’ Residence as DAVIDSON’s address. Based on my review of an online baby registry, I understand that OLUJOBI and DAVIDSON had at least one child together.

iii. In or about August 2024, Victim Bank-1 stopped allowing cardholder address changes to the Defendants’ Residence. At or around that same time, the caller began changing the cardholder’s address to one of three additional Hopewell Junction addresses, located in close proximity to the Defendants’ Residence:

1. The “Jackson Road Address,” which is located, based on my review of publicly available maps from Google, at a farm right next door to the Defendants’ Residence;

2. The “Shenandoah Road Address,” which is located, based on my review of publicly available maps from Google, on the other side of the farm and a 4-minute drive from the Defendants’ Residence; and

3. The “Lake Walton Road Address,” which is located, based on my review of publicly available maps from Google, a 12-minute drive from the Shenandoah Road Address.

The Defendants’ Residence, Jackson Road Address, Shenandoah Road Address, and Lake Walton Road Address are collectively referred to as the “Hopewell Junction Addresses.”

iv. Once the accountholder’s address was changed in Victim Bank-1’s records—and often within the hour—one of the perpetrators of the account takeover scheme would contact Victim Bank-1’s customer service, either by phone or electronic message, report a card associated with the account lost or stolen, and request that a new card be sent to the address on file (*i.e.*, one of the Hopewell Junction Addresses). The bank would then mail a replacement card to the Hopewell Junction Address on file, and one of the perpetrators would activate it so it could be used.

v. In some instances, requests to make changes to the accounts triggered an identity verification control, requiring the caller to receive a one-time passcode on their mobile device. When this happened, the caller typically told Victim Bank-1’s customer

service that they did not have a phone capable of receiving a passcode. As a result, a letter was instead sent to the address on file (*i.e.*, one of the Hopewell Junction Addresses that the perpetrators of this fraud scheme had themselves associated with the account). When the letter was received, the perpetrators would contact Victim Bank-1's customer service and provide the code.

vi. Once the cards were activated, they were used to make, in the aggregate, approximately hundreds of thousands of dollars of unauthorized and fraudulent purchases of various items, including gift cards, electronics, and other merchandise at various stores. Victim Bank-1's customer service records show that when these transactions were declined or when transactions approached the credit limit associated with the relevant account, someone promptly contacted Victim Bank-1's customer service and approved the charges or requested a credit limit increase. That person was not, however, the authorized accountholder.

15. Based on my review of surveillance video associated with certain fraudulent transactions involving stolen Victim Bank-1 cards, I am aware that there is surveillance video depicting at least approximately 54 fraudulent transactions—involving approximately 32 different cards and totaling approximately \$154,738—that is consistent with these fraudulent transactions being conducted by OPEYEMI OLUJOBI a/k/a “Tyler Olujobi” and JENNIE DAVIDSON, the defendants.

a. Based on my review of photographs of OLUJOBI from law enforcement databases and his social media, and upon comparing those photographs with those taken of the male individual who made many of the fraudulent transactions, I believe that individual to be OLUJOBI:



OLUJOBI from law enforcement databases



OLUJOBI from his public social media accounts



The male identified in surveillance footage

b. Based on my review of photographs of DAVIDSON from law enforcement databases and account creation images for DAVIDSON's account with Betting Platform-1 (where, as discussed below, DAVIDSON laundered fraudulently obtained proceeds), and upon comparing

those photographs with those taken of the female individual who made many of the fraudulent transactions, I believe that individual to be DAVIDSON:



DAVIDSON from law enforcement databases



DAVIDSON from her records with Betting Platform-1



The female identified in surveillance footage

c. Additionally, based on my review of images from DAVIDSON's social media accounts, I am aware that she has distinctive tattoos on both of her arms and her left hand. As depicted below, and based on my review of surveillance images of the female who made many of the fraudulent transactions, I believe that individual has the same tattoos as DAVIDSON. In addition, based on my review of images from DAVIDSON's social media accounts, I am aware that she has had numerous distinctive hairstyles, including the red shaved style and light brown/blond waves depicted above, and the long black curls and red dreadlocks depicted below. Based on my review of surveillance images of the female who made many of the fraudulent transactions, I believe that individual sports the same distinctive hairstyles as DAVIDSON:



DAVIDSON from her social media account, with tattoo on right arm circled



The female identified in surveillance footage, with tattoo on right arm circled



DAVIDSON from her social media account, with tattoo on left arm circled



The female identified in surveillance footage, with tattoo on left arm circled

Example Fraudulent Transactions and Aggravated Identity Theft

16. As discussed below, based on my participation in this investigation, including the information described in the foregoing paragraphs, I have learned that, from at least in or about May 2023 through at least in or about October 2024, OPEYEMI OLUJOBI a/k/a “Tyler Olujobi,” and JENNIE DAVIDSON, the defendants, used credit cards bearing the names of other individuals, which they obtained through their and/or their co-conspirators’ use of the victims’ various means of identification, without authorization.

Victim-1

17. As detailed below, based on my participation in this investigation, my review of Victim Bank-1’s customer service records, and transaction records and surveillance footage from a nationwide retail store (“Store-1”), my review of Victim Bank-1’s and Store-1’s records relating to a credit card ending in -4802 (“Card-4802”), and my conversations with the named cardholder of Card-4802 (“Victim-1”), I understand that OPEYEMI OLUJOBI a/k/a “Tyler Olujobi,” and JENNIE DAVIDSON, the defendants, fraudulently obtained Card-4802 and made around \$6,900 in fraudulent, unauthorized transactions.

18. Specifically, based on my review of Victim Bank-1’s customer service records, and my communications with agents of Victim Bank-1, I understand the following, in substance and in part:

a. On or about May 6, 2024, at around 8:06 a.m., an unidentified individual, who identified himself by name as Victim-1, called Victim Bank-1’s customer service line. Victim Bank-1’s customer service representative asked the caller to provide the phone number on Victim-1’s account, and the caller gave Victim-1’s phone number. When asked to provide the last four digits of Victim-1’s social security number, the caller did so. The caller then asked to change the address associated with Victim-1’s account from Victim-1’s address in Lancaster, Pennsylvania, to the Defendants’ Residence. The request was approved, and Victim-1’s address was changed. Based on conversations with Victim-1, I know that he never authorized this change of address.

b. Based on my review of Victim Bank-1’s customer service records, I am aware that later that same day—on or about May 6, 2024, at around 8:23 a.m.—an unidentified individual purporting to be Victim-1 contacted Victim Bank-1 through its online customer service platform, reported Victim-1’s credit card lost or stolen, and requested that a replacement card be sent to the address on file (*i.e.*, the Defendants’ Residence). Victim Bank-1’s internal records show that Card-4802 was then shipped to the Defendants’ Residence on or about May 9, 2024.

a. Based on my listening to call recordings and comparing the voices of the callers, I believe that shortly after calling to change Victim-1’s address, at or about 8:34 a.m., the same unidentified individual called Victim Bank-1 customer service. He identified himself by name as Victim-1, and, when prompted, provided Victim-1’s phone number and the last four digits of Victim-1’s social security number. He asked to change Victim-1’s phone number. The Victim Bank-1 customer service representative asked if the caller had an alternate phone number capable of receiving a one-time passcode. The caller said he did not. The Victim Bank-1 customer service representative said that a letter with a one-time passcode would be sent to the address on file. The

caller asked to confirm the address on file, and verified that the Defendants' Residence was the correct address to receive the passcode.

c. On or about May 13, 2024, at approximately 1:44 p.m., an unidentified individual purporting to be Victim-1 contacted Victim Bank-1 through its online customer service platform and activated Card-4802.

19. On or about May 13, 2024—the same day Card-4802 was activated—I understand that the following happened, in substance and in part:

a. At around 7:07 p.m., based on my review of parking lot surveillance footage from Store-1 and DMV records, a vehicle registered to JENNIE DAVIDSON, the defendant, arrived at a Store-1 retail location in Norwalk, Connecticut.

b. At around 7:18 p.m., based on my review of surveillance footage from inside Store-1's Norwalk, Connecticut, location and transaction records from Victim Bank-1 and Store-1, an individual who I believe to be OPEYEMI OLUJOBI, the defendant, approached a self-checkout station and attempted to make purchases using Card-4802, but those transactions were declined. Surveillance images are below:



c. From around 7:18 to 7:22 p.m., Victim Bank-1's records show that an unidentified individual purporting to be Victim-1 contacted Victim Bank-1 through its online customer service messaging platform and approved all OLUJOBI's attempted purchases.

d. Starting from around 7:22 p.m., based on my review of Store-1 surveillance footage and Victim Bank-1's and Store-1's transaction records, OLUJOBI made approximately ten separate transactions using Card-4802 to purchase approximately ten gift cards totaling \$4,000.

20. On or about May 14, 2024, I understand that, based on Store-1 surveillance footage, OPEYEMI OLUJOBI a/k/a "Tyler Olujobi," the defendant, returned to the same Store-1 location in Norwalk, Connecticut, and purchased another approximately \$3,300 in gift cards and merchandise, including flowers and various gardening supplies using Card-4802.

21. Based on my conversations with Victim-1 and my review of records obtained from Victim Bank-1, I know that Victim-1 is a real person, he never authorized anyone else to use Card-4802, and he reported the foregoing transactions as fraudulent.

Victim-2

22. As detailed below, based on my participation in this investigation, my review of Victim Bank-1's customer service records, transaction records, and surveillance footage from a nationwide retail store ("Store-2"), my review of Victim Bank-1's and Store-2's records relating to a credit card ending in -9133 ("Card-9133"), and my conversations with the named cardholder of Card-9133 ("Victim-2"), I understand that OPEYEMI OLUJOBI a/k/a "Tyler Olujobi," and JENNIE DAVIDSON, the defendants, fraudulently obtained Card-9133 in Victim-2's name and made approximately \$21,854 in fraudulent, unauthorized transactions.

23. Specifically, based on my review of Victim Bank-1's customer service records, and my communications with agents of Victim Bank-1, I understand the following, in substance and in part:

a. On or about July 24, 2024, at around 9:29 a.m., an unidentified individual contacted Victim Bank-1's customer service by phone and identified himself as Victim-2. Based on comparing the phone call recordings, I believe the caller is the same individual who called Victim Bank-1 purporting to be Victim-1. When prompted, the caller provided Victim-2's phone number and the last four digits of Victim-2's social security number for identity verification purposes. The caller then asked to change the address associated with Victim-2's account from an address in Danville, Pennsylvania, to the Shenandoah Road Address. The request was approved, and Victim-2's address was changed to the Shenandoah Road Address. Based on conversations with Victim-2, I know that he never authorized this change of address.

b. On or about July 24, 2024, at around 9:56 a.m., an unidentified individual purporting to be Victim-2 contacted Victim Bank-1's customer service, reported Victim-2's credit card lost or stolen, and requested that a replacement card be sent to the address on file (*i.e.*, the Shenandoah Road Address). Card-9133 was shipped to the Shenandoah Road Address on or about July 27, 2024.

c. On or about August 1, 2024, at 3:27 pm, an unidentified individual purporting to be Victim-2 contacted Victim Bank-1 through its online customer service messaging platform and activated Card-9133.

24. On or about August 1, 2024—the same day Card-9133 was activated—I understand that the following happened, in substance and in part:

Store-2's Kingston, New York, Location

a. At around 6:14 p.m., based on my review of surveillance footage from Store-2's Kingston, New York, location and transaction records from Victim Bank-1 and Store-2, an individual who I believe to be JENNIE DAVIDSON, the defendant, approached a self-checkout

station at a Store-2 retail location in Kingston, New York, and attempted to make purchases using Card-9133, but those transactions were declined. Surveillance footage shows an individual having DAVIDSON's same arm tattoos (circled in red) and red dreadlock hairstyle as reflected in her social media account, and with her holding several gift cards:



b. From around 6:14 p.m. through around 6:22 p.m., an unidentified individual purporting to be Victim-2 contacted Victim Bank-1 by SMS and approved all DAVIDSON's charges.

c. Starting from around 6:23 p.m., based on my review of Store-2 surveillance footage and transaction records from Victim Bank-1 and Store-2, DAVIDSON made approximately nine separate transactions to purchase approximately \$4,460 in gift cards and merchandise, including clothing, food, paper products, and baby formula, using Card-9133.

Store-2's Newburgh, New York, Location

d. Based on my review of surveillance footage from Store-2's Newburgh, New York, location and transaction records from Victim Bank-1 and Store-2, an individual who I believe to be JENNIE DAVIDSON, the defendant, approached a self-checkout station and two separate store clerks (one at around 8:46 p.m. and another at around 8:50 p.m.) at a second Store-2 retail location in Newburgh, New York, and made various purchases using Card-9133. Surveillance footage shows an individual appearing identical to the person depicted in the surveillance footage at Store-2's Kingston location, and with the same distinctive arm tattoos (circled in red) as DAVIDSON and red dreadlock hairstyle as in her social media account:



e. Starting at around 8:47 p.m., based on my review of Store-2 surveillance footage and my review of transaction records from Victim Bank-1 and Store-2, DAVIDSON purchased approximately \$2,710 in gift cards and tablets and other electronics, using Card-9133.

Additional Store-2 Purchases in Connecticut

25. On or about August 2, 2024, based on my review of Victim Bank-1's customer service records, I understand that someone purporting to be Victim-2 contacted Victim Bank-1 and increased the credit line associated with Card-9133.

26. On or about August 3 and 4, 2024, based on my review of transaction records from Victim Bank-1 and Store-2, I understand that someone using Card-9133 made an additional approximately \$14,684 in transactions to purchase gift cards and merchandise, including clothing, electronics, and toiletries at three different Store-2 locations in New York and Connecticut.

27. Based on conversations with Victim-2 and my review of records obtained from Victim Bank-1, I know that Victim-2 is a real person, he never authorized anyone else to use Card-9133, and he reported the foregoing transactions as fraudulent.

Victim-3

28. As detailed below, based on my participation in this investigation, my review of Victim Bank-1's customer service records, transaction records and surveillance footage from Store-2 and a national electronics retail store ("Store-3"), my review of Victim Bank-1's, Store-2's, and Store-3's records relating to a credit card ending in -2081 ("Card-2081"), and my conversations with the named cardholder of Card-2081 ("Victim-3"), I understand that OPEYEMI OLUJOBI a/k/a "Tyler Olujobi," and JENNIE DAVIDSON, the defendants, fraudulently obtained Card-2081 in Victim-3's name and made approximately \$19,600 in fraudulent, unauthorized transactions.

29. Specifically, based on my review of Victim Bank-1's customer service records, and my communications with agents of Victim Bank-1, I understand the following, in substance and in part:

a. On or about August 1, 2024, at around 11:09 a.m., an unidentified individual, who identified himself by name as Victim-3, called Victim Bank-1's customer service. Based on comparing the call recordings, I believe this is the same caller who called Victim Bank-1 purporting to be Victim-1 and Victim-2. Victim Bank-1's customer service representative asked him to provide Victim-3's phone number and the last four digits of Victim-3's social security number for identity verification, and the caller provided both numbers. The caller then asked to change the address associated with Victim-3's account from an address in Langhorne, Pennsylvania, to the Lake Walton Road Address. The request was approved, and Victim-3's address was changed. Based on conversations with Victim-3, I know that he never authorized this change of address.

b. Following the change of address, an unidentified individual connected to Victim Bank-1's online customer service platform, reported Victim-3's card lost or stolen, and requested that a new card be sent to the address on file (*i.e.*, the Lake Walton Road Address).

c. At approximately 11:43 a.m., based on my listening to the call recordings and comparing the voices of the callers, the same unidentified caller called Victim Bank-1 customer service and again identified himself as Victim-3 by name. Victim Bank-1's customer service representative asked the caller to provide Victim-3's phone number and the last four digits of Victim-3's social security number, which the caller provided. Victim Bank-1's customer service representative asked for Victim-3's date of birth, and the caller provided it. The caller then asked to change the phone number on Victim-3's account. The Victim Bank-1 customer service representative asked if the caller would agree to receive a link sent to an email or phone number, which would prompt him to film a video holding his state-issued identification for verification purposes. The caller refused to agree to those means of verification, and the Victim Bank-1 customer service representative said that a letter with a one-time passcode would be sent to the address on file.⁵

d. Card-2081 was shipped to the Lake Walton Road Address on or about August 5, 2024.

e. On or about August 9, 2024, an unidentified individual purporting to be Victim-3 contacted Victim Bank-1 through its online customer service platform and activated Card-2081.

30. On or about August 9, 2024—the same day Card-2081 was activated—I understand that the following happened, in substance and in part:

Store-2's Monroe, New York, Location

a. At around 6:17 p.m., based on my review of surveillance footage from Store-2's Monroe, New York, location and transaction records from Victim Bank-1 and Store-2, an individual who I believe to be JENNIE DAVIDSON, the defendant, approached a self-checkout station at a Store-2 retail location in Monroe, New York, and attempted to make purchases using Card-2081, but those transactions were declined. Within a minute, an unidentified individual purporting to be Victim-3 contacted Victim Bank-1 by SMS and approved all DAVIDSON's charges. Surveillance footage from the time of the fraudulent transactions shows an individual with the same distinctive left-hand tattoo (circled in red) as shown in images from DAVIDSON's social media. Additionally, DAVIDSON can be seen with the same red dreadlock hairstyle depicted in DAVIDSON's above social media photographs and in the above-referenced fraudulent transactions from around a week earlier:

⁵ After the caller hung up, he called right back. At around 12:09 p.m., based on my listening to the call recordings and comparing the voices of the callers, the same caller called Victim Bank-1's customer service, again attempted to change the phone number of the account, and was told substantially the same thing about verifying the request. He, once again, agreed to receive a passcode in the mail.



The female identified in surveillance footage, holding several gift cards and Victim-3's credit card with the activation sticker still on the card (LEFT) and showing a distinctive hand tattoo (RIGHT)

DAVIDSON from social media, showing a distinctive hand tattoo

b. Starting at around 6:17 p.m., based on my review of surveillance footage from Store-2 and transaction records from Victim Bank-1 and Store-2, DAVIDSON made approximately 14 separate transactions in which she bought more than \$9,100 in gift cards and merchandise, including clothing, electronics, toys, and toiletries, using Card-2081.

Store-3's Middletown, New York Location

c. At around 6:50 p.m., based on my review of customer service records from Victim Bank-1, an unidentified individual purporting to be Victim-3 contacted Victim Bank-1 through its online customer service platform and increased the credit line associated with Card-2081.

d. At around 7:51 p.m., based on my review of transaction records from Victim Bank-1 and Store-3, an unidentified individual purchased more than \$5,200 in gift cards and merchandise, including tablets and smart watches, using Card-2081 at a Store-3 location in Middletown, New York.

31. Based on my review of records provided by Store-3, a technology company ("Company-1"), financial institutions, and mobile phone providers, I understand the following, in substance and in part, about the fraudulent transactions that took place on or about August 9, 2024:

a. Based on my review of records obtained from Store-3, the aforementioned Store-3 fraudulent transactions were connected with a Store-3 rewards program account associated with the Defendants' Residence.⁶

b. Based on my review of records obtained from Company-1, the email address listed in Store-3's records as associated with the Store-3 rewards program account is an email address associated with a Company-1 ID subscribed to "Tyler Olujobi."

⁶ The name associated with the Store-3 rewards account is a different male name. And the email address listed has yet another different male's name followed by the numbers "007."

c. Based on my review of records from financial institution accounts in OLUJOBI's name, the phone number listed in the Company-1 subscriber records is the same phone number as listed in OLUJOBI's financial accounts.

d. Based on my review of mobile phone subscriber records, the same phone number listed in the Company-1 subscriber records is subscribed to an individual with the name "Tyler Olujobi."

Store-2's Mohegan Lake, New York Location

32. Based on my participation in this investigation, my review of Victim Bank-1's customer-service call records, transaction records and surveillance footage from a Store-2 location in Mohegan Lake, New York, and my review of Victim Bank-1's and Store-2's records relating to Card-2081, I understand that, on or about August 11, 2024—two days after Card-2081 was activated—the following happened, in substance and in part:

a. At around 10:59 p.m., based on my review of surveillance footage from Store-2's Mohegan Lake, New York, location and transaction records from Victim Bank-1 and Store-2, an individual who I believe to be OPEYEMI OLUJOBI a/k/a "Tyler Olujobi," the defendant, approached a self-checkout station at a Store-2 retail location in Mohegan Lake, New York, and made purchases using Card-2081. Surveillance footage from the time of the transactions shows an individual who appears to be OLUJOBI:



b. Based on my review of transaction records from Victim Bank-1 and Store-2, OLUJOBI purchased approximately \$3,200 in gift cards and merchandise, including clothing and electronics, using Card-2081.

Additional Store-2 Purchases in Monroe, New York

33. Store transaction records and Victim Bank-1 transaction records show that on or about August 10, 2024, Card-2081 was used to conduct a series of transactions at the same Store-2 location in Monroe, New York (the same location at which JENNIE DAVIDSON, the defendant, made the fraudulent transactions referenced in Paragraph 30(a), above). During these transactions, more than approximately \$2,100 in gift cards and merchandise was charged to Card-2081.

34. Based on conversations with Victim-3 and review of records obtained from Victim Bank-1, I know that Victim-3 is a real person, he never authorized anyone else to use Card-2081, and he reported the foregoing transactions as fraudulent.

Victim-4

35. As detailed below, based on my participation in this investigation, my review of Victim Bank-1's customer-service call records, transaction records and surveillance footage from Store-2, my review of Victim Bank-1's and Store-2's records relating to a credit card ending in -1606 ("Card-1606"), and my conversations with the named cardholder of Card-1606 ("Victim-4"), I understand that OPEYEMI OLUJOBI a/k/a "Tyler Olujobi," and JENNIE DAVIDSON, the defendants, fraudulently obtained Card-1606 in Victim-4's name and made \$17,100 in fraudulent, unauthorized transactions.

36. Specifically, based on my review of Victim Bank-1's customer service records, and my communications with agents of Victim Bank-1, I understand the following, in substance and in part:

a. On or about September 12, 2024, at around 9:08 a.m., an unidentified individual called Victim Bank-1 and identified himself by name as Victim-4. The caller then asked to change the address associated with Victim-4's account from an address in Fort Deposit, Alabama, to the Lake Walton Road Address. The request was approved, and Victim-4's address was changed. Based on conversations with Victim-4, I know that she never authorized this change of address.

b. Later that same day, on or about September 12, 2024, at around 10:59 a.m., an unidentified individual purporting to be Victim-4 called Victim Bank-1 customer service, reported Victim-4's credit card as lost or stolen, and requested that a replacement card be sent to the address on file (*i.e.*, the Lake Walton Road Address).

c. At or about 3:17 pm, an unidentified caller called Victim Bank-1 customer service and asked to change the phone number associated with Victim-4's account. Based on comparing the call recordings, I believe that this individual is the same caller who called Victim Bank-1 purporting to be Victim-1, Victim-2, and Victim-3. When prompted, the caller provided Victim-4's phone number, the last four digits of Victim-4's social security number, and Victim-4's birth date. The caller then asked to change the phone number on Victim-4's account. The Victim Bank-1 customer service representative asked if the caller would agree to take a five-second video holding his state-issued identification for verification purposes. The caller refused to agree to those means of verification, and the Victim Bank-1 customer service representative said that a letter with a one-time passcode would be sent to the address on file.

d. Card-1606 was shipped to the Lake Walton Road Address on or about September 16, 2024.

e. On or about September 23, 2024, an unidentified individual purporting to be Victim-4 contacted Victim Bank-1 through its online customer service platform and activated Card-1606.

37. Between on or about September 23, 2024—the same day Card-1606 was activated—and on or about September 27, 2024, I understand that the following happened, in substance and in part:

Store-2's and Store-4's Riverdale, New Jersey, Locations

a. On or about September 23, 2024, at around 5:28 p.m., based on my review of surveillance footage from Store-2's Riverdale, New Jersey, location and transaction records from Victim Bank-1 and Store-2, two individuals who I believe to be OPEYEMI OLUJOB1 a/k/a "Tyler Olujobi," and JENNIE DAVIDSON, the defendants, made multiple transactions at Store-2 retail location in Riverdale, New Jersey, using Card-1606.



b. On or about September 23, 2024, starting from around 5:28 p.m. to around 6:25 p.m., based on my review of transaction records from Victim Bank-1 and Store-2, OLUJOB1 and DAVIDSON engaged in a series of transactions to purchase more than approximately \$9,700 in gift cards and merchandise, including electronics, clothing, and toys using Card-1606.

c. On or about September 23, 2024, at around 6:56 p.m., based on my review of transaction records from Victim Bank-1, an unidentified individual or group of individuals made an approximately \$500 purchase at a nationwide discount variety store ("Store-4"), which was located in the same Riverdale, New Jersey, shopping center as Store 2's Riverside, New Jersey, location identified above, using Card-1606.

d. On or about September 25, 2024, at around 4:08 p.m., based on my review of surveillance footage from Store-2 and transaction records from Victim Bank-1 and Store-2, someone who I believe to be DAVIDSON returned to the same Store-2 location in Riverdale, New Jersey, and engaged in another series of transactions. Surveillance footage shows an individual who appears to be the same individual (*i.e.*, DAVIDSON) who made the Store-2 transactions from two days earlier. Additionally, DAVIDSON can be seen carrying a baby. Based on my review of

a May 2024 baby registry for OLUJOBI and DAVIDSON, I believe that at the time of these transactions they had at least one child together:



e. Based on my review of transaction records from Victim Bank-1 and Store-2, I understand that, during these transactions, DAVIDSON purchased more than approximately \$3,400 in gift cards and merchandise, including electronics, clothing, and toys, using Card-1606.

Additional Store-2 Transactions in Fishkill,
Wappingers Falls, and Poughkeepsie, New York

38. Based on my review of transaction records from Victim Bank-1, from on or about September 24 through 27, 2024, an unidentified individual or group of individuals made at least approximately \$3,500 in transactions for gift cards and merchandise, including clothing and electronics, at approximately six different stores in Fishkill, Wappingers Falls, and Poughkeepsie, New York, using Card-1606. Based on my review of transaction records and customer service records from Victim Bank-1, Victim Bank-1 declined many of these charges. On each occasion, however, an individual purporting to be Victim-4 contacted Victim Bank-1 through its online customer service platform and approved all charges.

39. In one such instance, on or about September 25, 2024, an unidentified caller, who, based on my training and experience, sounds like the same caller who called Victim Bank-1 customer service purporting to be Victim-1, Victim-2, and Victim-3, called Victim Bank-1 customer service trying to approve the declined charges. He identified himself as Victim-4 by name. The caller was told he would need to complete an identity verification process involving taking a five-second video holding valid identification, and he hung up. Within 10 minutes, the same caller called back, identified himself by name as Victim-4, and reported that charges on Card-1606 had been declined. He was again told he had to complete an identity verification process. The caller provided a one-time passcode that had been sent via letter. The customer service representative informed him that the passcode he had provided was a “previous” code and a new one had been sent. She again began to suggest that the caller complete the standard identity verification process, but the caller hung up before she finished her sentence.

40. Based on my conversations with Victim-4 and review of records obtained from Victim Bank-1, I know that Victim-4 is a real person, she never authorized anyone else to use Card-1606, and she reported the foregoing transactions as fraudulent.

DAVIDSON's Money Laundering

41. As discussed below, based on my participation in this investigation, including the information described in the foregoing paragraphs, I have learned that, from at least in or about May 2024 through at least in or about August 2024, JENNIE DAVIDSON, the defendant, deposited the proceeds of her fraudulent transactions into an account she held with Betting Platform-1, which was registered in her name. She then withdrew nearly all of those funds and deposited them into a bank account in her name, having used her Betting Platform-1 account to obscure the source of the funds.

42. Based on my review of account creation records from Betting Platform-1, JENNIE DAVIDSON, the defendant, held a gambling account with the company. As noted above in Paragraph 15(b), DAVIDSON submitted multiple pictures of herself, her passport, and her driver's license to confirm her identity. Additionally, DAVIDSON's account is registered in her name and with the same date of birth listed for DAVIDSON in law enforcement reports and records. Moreover, the email address associated with the Betting Platform-1 account is the same email address listed on the Store-3 rewards account OLUJOBI connected with his August 9, 2024, purchases at Store-3 using Card-2081 and DAVIDSON's own separate Company-1⁷ account connected with her name and the Defendants' Residence.

43. Based on my review of account transaction records from Betting Platform-1, I understand the following, in substance and in part:

a. From on or about May 5, 2024, through on or about August 18, 2024, JENNIE DAVIDSON, the defendant, made approximately 128 deposits using 95 different credit cards. Most of these transactions were made using prepaid credit cards (*i.e.*, gift cards).

b. Based on my review of DAVIDSON's win/loss statement for 2024 from Betting Platform-1, I understand that DAVIDSON deposited approximately \$37,809 into and withdrew approximately \$37,822 from her Betting Platform-1 account in 2024; however, she wagered only \$704. Based on my training and experience, I know that this pattern is consistent with money laundering.

c. Based on Betting Platform-1 transaction records and bank records for accounts held in DAVIDSON's name, approximately 25 of the 26 withdrawals DAVIDSON made from her Betting Platform-1 account—and all but \$35 of the total withdrawal amount—were withdrawn onto a debit card issued to DAVIDSON and connected to a bank account in DAVIDSON's name.

⁷ The same technology company referred to in paragraph 31.

44. Based on my review of transaction records from Victim Bank-1 and the account deposit and withdrawal activity for JENNIE DAVIDSON's, the defendant's, account with Betting Platform-1, I understand the following, in substance and in part:

a. Based on records provided by gift card providers, on or about August 1, 2024, an unidentified individual or group of individuals activated approximately eight gift cards purchased through fraudulent transactions using Card-9133 at Store-2's Newburgh and Kingston, New York, locations. These gift cards ended in -0498, -5854, -2929, -3853, -5488, -1678, -0770, and -3139. These gift cards were purchased by DAVIDSON herself, as confirmed by contemporaneous surveillance footage of the respective transactions from Store-2 discussed above in Paragraph 24(a)–(e).

b. As reflected in Betting Platform-1's deposit records for DAVIDSON's Betting Platform-1 account, DAVIDSON used these eight cards to deposit approximately \$4,000 into her Betting Platform-1 account.

c. Based on data from a technology company, I know that DAVIDSON's email address was associated with the same IP addresses as the Betting Platform-1 deposits: 174.215.219.218 on or about August 3, 2024; 68.193.129.88 on or about August 5, 2024; and 174.251.64.2 on or about August 9, 2024.

d. Based on bank records for DAVIDSON's accounts and Betting Platform-1 withdrawal records, DAVIDSON transferred approximately \$6,600 to her bank account between on or about August 3 and 5, 2024.

45. Based on my review of communications between Betting Platform-1 and JENNIE DAVIDSON, the defendant, I understand, in substance and in part, that, on or about August 13, 2024, Betting Platform-1 put a temporary hold on DAVIDSON's Betting Platform-1 account to "fully verify [her] identity." As a result, Betting Platform-1 requested certain identification documents from DAVIDSON, including a U.S. driver's license, U.S. passport or passport card, and a U.S. state ID card, which she provided. Over the course of the following two months, DAVIDSON sent more communications about the status of her account, stating, for example, on or about September 18, 2024, "Good Afternoon to whom it may concern I am reaching out for assistance regarding my account. I have not [h]ad any access to deposit or withdrawal my money from my account for almost 2 months now. That money in my account belongs to me and it is my right to get access to my money. I have long submitted all of the required documents asked of, yet I still have no access to my access or any of my money." On or about September 23, 2024, Betting Platform-1 informed DAVIDSON that they "decided to permanently close [her] account" and directed her to "[p]lease refrain from opening new accounts on any of our platforms as this will result in account closure." DAVIDSON immediately responded, "I am not sure as to why my account is being closed, but what I do know is that my funds that are in the account needs to be refunded or deposited to me as soon as possible. [Betting Platform-1] has the right to close any account, but you guys do not have the right to withhold funds that DO NOT BELONG TO YOU. Therefore I would like to be made aware as to how I will be receiving my money that is currently in the account."

WHEREFORE, I respectfully request that warrants be issued for the arrest of OPEYEMI OLUJOBI, a/k/a "Tyler Olujobi," and JENNIE DAVIDSON, the defendants and that they be arrested, and imprisoned or bailed, as the case may be.



GREG T. GHIOZZI
Postal Inspector
United States Postal Inspection Service

Sworn to before me
This 20th day of April 2026



THE HONORABLE ANDREW E. KRAUSE
UNITED STATES MAGISTRATE JUDGE
SOUTHERN DISTRICT OF NEW YORK